

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

DAVIS POLK & WARDWELL LLP, Thomas
Reid, John Bick, William Chudd, Sophia
Hudson, Harold Birnbaum, Daniel Brass,
Brian Wolfe, and John Butler,

Defendants.

19 Civ. 10256 (GHW)

**DEFENDANTS' REPLY MEMORANDUM OF LAW IN SUPPORT OF THEIR
APPLICATION FOR FEES AND COSTS**

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Attorneys for Defendants

Dated: January 29, 2021

Defendants see no need to burden the Court with further submissions on this application. Defendants rely entirely on their moving papers and leave to the Court's discretion the formulation of an award of fees and costs that is both fair and equitable while also appropriately addressing plaintiff's repeated discovery violations.

Dated: January 29, 2021
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Bruce Birenboim
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